ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

MEMORANDUM

DATE June 6, 1984

TO Division File

FROM Jim Wiggins, DLPC, and Jay Patel DWPC/FOS - Maywood Office

SUBJECT KANKAKEE AIRPORT / RUSK CROP SPRAYING
RUSSEL AVIATION

On May 17th, 1984 a multi-media visit was conducted accompanied by Agricultural Advisor, A G Taylor, at the request of the Kankakee Airport Authority to solicit the information and to guide on operating practices of their fixed base aerial applicators

Present at the meeting were

Mr Bob Glade, Chairman of the Airport Authority and
Mr Steve Skorepa, Manager of the Airport

The following issues were discussed during the meeting

i) Site Location
ii) Chemical Storage
iii) Operation of the Aerial Applicators located at the Airport

After the discussion an on-site inspection of the following two facilities was conducted

i) Rusk Crop Spraying
ii) Russel Aviation

These facilities are situated adjacent to one another at the northwest corner of the airport Howard Wheeler of Rusk Spraying and Joe Russel of Russel Aviation were interviewed during the inspection of their respective facilities

In the course of the investigations the following areas of concern were noted

1 Open Burning
Several containers were observed burning upon the arrival at the Rusk Spraying Facility It was also found that it has been the usual practice in the past at both the facilities

2 Chemical Storage
Several tanks were found on site at both facilities ranging in capacities from approximately 1000 gallons to 25,000 gallons,

containing commonly used agricultural chemicals Adequate provisions for spill containment were not provided, such as dikes or impermeable pads underlying the tanks Several tanks were situated on the ground with no provisions for spill containment

A concrete pad for mixing and loading was observed at the Rusk Spraying facility A 1000 gallon underground holding tank is also utilized to store wastewater generated on site by Rusk Spraying According to Mr Wheeler, Manager of Rusk Spraying the underground tank has no discharge point and has not been pumped out in recent years

3 Rinsewater Containment
Airplane rinsing and cleaning activities were carried on at both facilities with no specific measures provided for containment or disposal of rinseate An underground tank provided at the Rusk facility designed for minimizing run-off problems did not seem to adequately collect surface water run-off during mixing and loading operation

4 Mixing Operation
Well water is used for mixing and solution preparation in the mixing tank at the facilities No consideration was given to prevent back siphoning into the water supply while mixing chemicals

5 Previous Activities
Mr Joe Russel of Russel Aviation indicated that when he was employed by Rusk Spraying that it was the common practice to dispose of waste generated from pesticide operations by dumping them into the foundation of the existing office at Rusk Spraying Perhaps this warrants further investigation in an effort to determine the possible extent of the contamination and to prevent future problems

Possible Violations

Air Pollution

1) Open burning on site
----- violation of Environmental Protection Act
Section 9 (a) and (c)

Water Pollution

2) Possible contaminated run-off from the facility
----- Violation of E P Act Section 12 (a)

3) An underground tank being used as treatment unit may be subject to permit and possible discharge from the tank
----- Violation of E P Act Section 12 (b), (d) and (f)

Land Pollution

4) Possible unauthorized disposal / waste storage on site of Rusl Crop Spraying
----- Violation of E P Act Section 21 (?')

Recommendations

On the basis of the inspection performed and information obtained the following can be recommended

1) Open burning on site should be stopped to ensure compliance with Section 9 of the Environmental Protection Act

A commercial applicator cannot open burn pesticide containers at his place of business To burn at a commercial site, an incinerator is needed The best alternative is to dispose off at a nearby approved landfill

2) Storage facilities should be lined with impermeable materials A means to monitor for leals may be necessary in some cases

3) Storage facilities should have a large enough volume to contain anticipated amounts of wastes to be generated Overflow and discharge pipes should not be constructed into the systems

4) Storage facility should be protected against vandalism

5) All reasonable measures, including where appropriate the provision of catchment areas, relief vessels, or entrapment dikes shall be taken to prevent any spillage of contaminants from causing water pollution

6) Dikes should be able to contain at least 1½ times the volume of the largest storage tank being protected

7) The base of the diked area should be impermeable and the berms should be compacted to prevent failure

8) Regular inspection of storage equipment is essential to a spill prevention program

9) Report all spills immediately to your local emergency response agent This will initiate actions to prevent a major disaster

10) Consideration should be given to prevent back-siphoning into the water supply Back-siphoning can be prevented by constructing a device that keeps the end of the hose at least six inches above the tank opening while filling

11) An underground tank of Rusk Spraying should be pressure tested for any possible leaks It is recommended that Kankakee Airport and/or Rusk Crop Spraying submit design and specification of this tank to the Agency

12) It will be advisable for Kankakee Airport Authority and/or its operators to conduct sampling of soil and water at various points at the facilities to determine the possible extent of the contamination due to past practices

JP wn

cc - DWPC/FOS/RU
- DAPC/Maywood, Attn Sy Levine
- DLPC/Maywood, Attn Ken Bechely
- A G Taylor, Ag Advisor Springfield
- Major Hearn/Maywood
- EPS, Maywood